

# ISHMAN LAW FIRM, P.C.

9660 FALLS OF NEUSE ROAD, SUITE 138-350  
RALEIGH, NORTH CAROLINA 27615  
*mailing address*

FORUM I BUILDING  
8601 SIX FORKS RD., ST. 400  
RALEIGH, NC 27615

TEL: (919) 468-3266  
FACSIMILE: (919) 882-1466  
[www.IshmanLaw.com](http://www.IshmanLaw.com) | [www.IshmanLegal.com](http://www.IshmanLegal.com)

9104 FALLS OF NEUSE ROAD  
SUITE 200  
RALEIGH, NC 27615

September 12, 2018

**Sent via Email**

Natalie Potter <NPotter@essexrichards.com>  
Jonathan Buchan <Jbuchan@essexrichards.com>  
Essex Richards, P.A.  
1701 South Blvd.  
Charlotte, NC 28203

Re: *Baronius Press, Ltd. v. Saint Benedict Press, LLC*  
United States District Court, Western District of North Carolina  
Case No. 3:16-cv-00695-GCM

---

Dear Natalie,

I am surprised by your demand for a reply from Plaintiff on the same day! Plaintiff waited three weeks for Defendant to reply to its demand for a meet and confer, which when it did occur, did not resolve the noted discovery deficiencies.

Please note that the privilege log was supplied to you via email on April 26, 2018, and there is an entry in that version of the privilege log with BP-00931 explaining that the redacted part of that correspondence was a proprietary trade secret on how Plaintiff conducts its business. It is a trade secret that Plaintiff can identify as to its success in carrying out its business over the years.

Now that we have refreshed your memory as to Plaintiff's identification of BP-00931 in its previously disclosed April 26, 2018 privilege log, we will consider this concern resolved.

With regards,

*/s/ Mark W. Ishman*

Mark W. Ishman, Esq.

cc: Ms. Kristin Garris ([Garris@thsh.com](mailto:Garris@thsh.com))

---

ISHMAN LAW FIRM, P.C.

MARK W. ISHMAN

DIRECT LINE: (919) 539-7626  
[MISHMAN@ISHMANLAW.COM](mailto:MISHMAN@ISHMANLAW.COM)